

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)

Criminal No. _____

v.)

ROMAN VALDMA)

03 CR 103 53 WGY

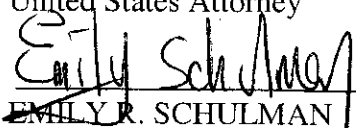
**GOVERNMENT'S MOTION TO SEAL
INDICTMENT**

Pursuant to FRCP 6(e)(4), the United States of America hereby moves this Court to direct that the indictment be sealed (and that no person shall disclose the return of the indictment except as necessary for the issuance and execution of a warrant) until the defendant's arrest in the above-captioned case. The government also hereby moves this Court to direct that the indictment be unsealed upon the defendant's arrest. As grounds for this motion, the government states that public disclosure of the indictment prior to the defendant's arrest could jeopardize the investigation of this matter and the safety of law enforcement officers. The government submits that sealing the indictment until the defendant's arrest and unsealing it thereafter will serve the interests of justice.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

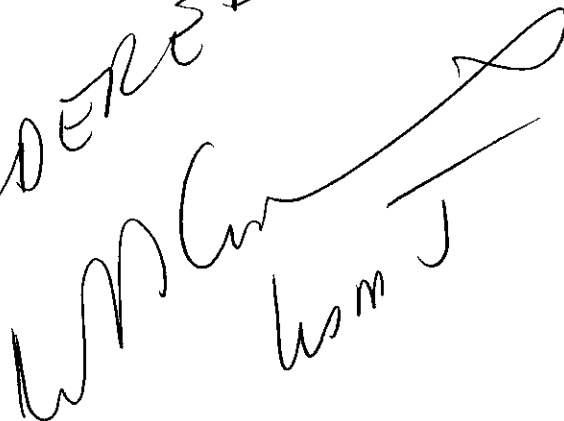
By:


EMILY R. SCHULMAN
KIMBERLY P. WEST
Assistant U.S. Attorneys

Date: November 19, 2003

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**ALLOWED;
SO ORDERED**


MJS